

HILDEBRAND, MCLEOD & NELSON, INC.
ATTORNEYS AT LAW
WESTLAKE BUILDING
350 FRANK H. OGAWA PLAZA, FOURTH FLOOR
OAKLAND, CALIFORNIA 94612-2006
(510) 451-6732

1
2
3
4
5
6
7 IN THE UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF OREGON
10 EUGENE DIVISION
11
12 JOSHUA RUND,) CASE NO. 6:19-cv-00865-MC
13 Plaintiff,)
14 vs.) **JOINT STIPULATION FOR
15 ALBANY & EASTERN RAILROAD) DISMISSAL WITH PREJUDICE
COMPANY, a domestic business) AND [PROPOSED] ORDER**
corporation;)
16 Defendant.)
17 _____
18

19 The parties to this action, acting through their respective counsel and pursuant to Federal
20 Rules of Civil Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement
21 executed by them, to the Dismissal with Prejudice of this action, including all claims stated herein
22 against Defendant, with each party to bear their own costs and attorney's fees.

23
24 DATED: December 28, 2020 HILDEBRAND, McLEOD & NELSON, LLP
25 By: */s/ Carole M. Bosch*
26 CAROLE M. BOSCH, OSB 190837
27 Attorneys for Plaintiff
28

1 DATED: July 28, 2020

SMITH FREED EBERHARD

2 */s/ Ryan J. McLellan*
3 By: RYAN J. MCLELLAN, OSB 023908
4 SEAN K. CONNER, OSB 132518
Attorneys for Defendant

5

6 **ORDER**

7 Pursuant to the above stipulation of the parties, the entire action, including all claims
8 stated herein against Defendant, is hereby dismissed with prejudice.

9

10 ENTERED this 4th day of January 2021.

11

12 s/Michael J. McShane
13 The Honorable Michael J. McShane
14 U.S. District Court for the District of Oregon

HILDEBRAND MCLEOD & NELSON, INC.
ATTORNEYS AT LAW
WESTLAKE BUILDING
350 FRANK H. OGAWA PLAZA, FOURTH FLOOR
OAKLAND, CALIFORNIA 94612-2006
(510) 451-6732